

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
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914-385-0292

In Re:

Case No.: 20-18560

Miguel A. Perez-Fleitas

Debtor(s).

Hearing Date: 12/9/2020

Chapter: 13

Judge: Hon. SLM

DEBTOR'S OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. 362(d)

The above named debtor, by and through his attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby opposes Homebridge Motion for Relief from the automatic Stay, and in support thereof presents the Certification of Paola D. Vera, Esq. and shows unto the Court the following:

1. On July 15, 2020 the debtor filed a voluntary Chapter 13 petition with the clerk of this court.
2. On October 28, 2020, Homebridge, filed a motion seeking relief from the automatic stay in regards to 1125 Monmouth Ave., Linden, New Jersey.
3. As of October 28, 2020 Debtor is delinquent a total of \$6,261.42.
4. On November 9, 2020 Debtor made a payment in the amount of \$2,087.14 via Cashier's check ending in 8935.

5. The Debtor would like the opportunity of paying the remaining balance owed to secured creditor in a six month cure to be paid directly to secured creditor along with the regular monthly mortgage payments commencing in December 2020.

6. The Debtor is willing to enter into a consent order to cure all post-petition arrears.

7. Therefore the Debtor respectfully requests that he be given the opportunity to cure all post-petition arrears.

WHEREFORE, the debtor respectfully request that the instant Motion be denied; and the debtor be granted such other and further relief as this Court deems proper.

Dated: Union City, New Jersey
November 23, 2020

CABANILLAS & ASSOCIATES, PC

/s/Paola D. Vera
Paola D. Vera, Esq.
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